ANTI- BRIBERY & ANTI-CORRUPTION POLICY

TFM Global Mobility is a quality-oriented company and committed to fight against corruption, bribery, and fraud activities. It is our policy to comply with all laws, rules and regulations governing anti-bribery and Prevention of Corruption.

This policy applies to individual employees, agents, suppliers, consultants or any other people or bodies associated with TFM Global Mobility or any of its subsidiaries and employees.

A “Bribe” is anything that has a value and is given to influence a decision to give a business advantage to the offer or, whether this is TFM Global Mobility or an entity seeking to do business with TFM Global Mobility. Bribes do not just involve cash payments. Lavish gifts, expensive dinners or wine, tickets to sporting events, and jewellery or gems have all been found to be bribes.

To achieve our commitment, we expect compliance of following code of conduct from all our clients, associates, business partners and suppliers:

- Never engage in any form of bribery, either directly or through any third party.
- Never offer or make an improper payment or authorise an improper payment (cash or otherwise) to any individual, including any local or foreign official anywhere in the world.
- Never attempt to induce an individual, or a local or foreign official to act illegally or improperly.
- Never offer, or accept, money or anything of value, such as gifts, kickbacks, or commissions, in connection with the procurement of business or the award of a contract.
- Never offer or give any gift or token of hospitality to any public employee or government official or representative if there is any expectation or implication for a return favour.
- Never accept any gift from any business partner if there is any suggestion that a return favour will be expected or implied.
- Never facilitate payments to obtain a level of service that one would not normally be entitled to.
- Never disregard or fail to report any indication of improper payments to the appropriate authorities.
- Never induce or assist another individual to break any applicable law or regulation.

This policy does not prohibit the following practices:

- Normal and appropriate hospitality (given or received) It is limited to only promotional business gift, such as calendars, diaries, pen, invitation to TFM Global Mobility organised sport or social cause.
- The giving of a ceremonial gift on a festival or at special Occasion. Gifts are accepted and distributed on special occasions only and are to remain modest and reasonable.

We expect cooperation from all the staff to adhere to this anti-corruption policy. Any employees, supplier or affiliate can report the non-compliance of any bribery and corruption activities in the organisation to management.

A suitable action will be taken against the employees, agent or supplier found involved in any kind of corruption activities.